

# Brock Fredin

Milwaukee, WI • Phone: (612) 424-5512 •

E-Mail: brockfredinlegal@icloud.com

Date: October 31, 2019

## BY ECF

Hon. Magistrate Judge Hildy Bowbeer  
United States District Court  
316 Robert St N  
Saint Paul, MN 55101

Re: Fredin v. Miller et al., Case No. 18-cv-466-SRN-HB  
Fredin v. Middlecamp, Case No. 17-cv-3058-SRN-HB

Dear Judge Bowbeer:

I write to briefly respond to your October 31, 2019 Order to Strike Declarations from the Docket. I am respectfully requesting to file an amended Declaration with only the "Authentication of Documents" section and an exhibit list. The Authentication of Documents section would only indicate the exhibit number, dates, and parties.

Recently, I discovered new evidence that substantiates my claims asserted in this action. More importantly, the new evidence negates the defenses asserted by Defendants in their respective motion to compel or opposition to limited discovery. Specifically, I was provided with a Freedom of Information ("FOIA) request dated October 28, 2019. It is my belief this was provided on this date to bypass discovery and motion deadlines in this matter.

From: 13.82 " " <13.82>  
To: "Heng, Mary Ellen" <MaryEllen.Heng@minneapolismn.gov>  
Subject: your counterpart at St. Paul?  
Date: Tue, 24 Jan 2017 15:44:45 +0000  
Attachments: 13.82 petitioner\_Respondent\_v\_Brock\_Fredin\_Appellant.pdf  
Inline-Images: image003.png

Mary Ellen,

Do you know/have contact info for your counterpart at the City of St. Paul? This is something of a professional courtesy email that, if you felt it was appropriate, I was hoping could be forwarded to their attention.

I have a friend who, in November of last year, got a restraining order against a man in St. Paul who stalked her for nearly two years even after she moved out of state all because she declined to meet him after brief contact on a dating site. He has retaliated against the restraining order in several dramatic ways; after storming out of the hearing at which it was granted, he promptly registered and launched a website referring to her by full name as a stalker and sexual predator and linking to her contact

13.82

Yesterday, the Court of Appeals issued an opinion in a different matter brought by a different woman (13.82) against the same man. I'm attaching it here. I can tell you that I've spoken with several of his former colleagues or acquaintances and this seems like a very troubled individual with a documented history of serial harassment and escalation. He has been kicked out of a local gym for concerning threatening behavior towards a trainer, has been blacklisted from certain community groups for his alarming online conduct, etc. I have serious concerns that if he is not held accountable for violations of this restraining order, he will escalate either in his aggression against my acquaintance, or in parallel tracks against other women.

The "professional courtesy" angle here is that I'm also aware my friend is being contacted by journalists with MPR and City Pages about her experiences with this man and other women's restraining orders and issues with him. I believe it is likely the narrative will take a position that "St. Paul is doing nothing to protect them" in light of the cops basically telling her her main recourse was stop googling her own name and try to move on with her life despite his persistent attempts to sabotage and harass her. I thought it was worth at least forwarding the Court of Appeals decision to the potential prosecutors to see if the pattern/trend of this man's troubling behavior causes them to have more confidence in the need to pursue him in 13.82 case. I know resources and other considerations dictate case load but sometimes having another lawyer confirm this isn't a total goose chase seems helpful in giving things another look.

Given this new development, I respectfully request that the Court grant me the opportunity to file a Declaration in this matter. As discussed in my stricken Declaration, the incorporation of this new evidence into my limited discovery motion is critical to my claims and directly undermines the defenses asserted by Defendants in their motion to compel.

The FOIA request shows evidence was destroyed. Moreover, the request indicates Ms. Middlecamp's knowledge of Ms. Schaefer and Miller. The evidence also indicates Ms. Middlecamp's improper actions to execute a vindictive prosecution and April 28, 2017 raid. Secondly, it appears Ms. Middlecamp's scheme included the improper use of Minneapolis City resources and use of her allegations as tabloid fodder on @CardsAgstHrsmt and the *City Pages*.

Hmm... a mystery...  
Does MPD-9648 still show open?

---

**From:** MacDonald, Kyle H  
**Sent:** Friday, May 31, 2019 9:13 AM  
**To:** Lamor, Lisa <lisa.lamor@minneapolismn.gov>  
**Subject:** RE: MPD 9648 / DP 181303 - Fredin

I'm not sure what happened with this request. I have a folder labeled Fredin production however it's empty. I'm looking through my assorted flash drives and I don't see one labeled 9648 or 181303.

I thank the Court's for its attention to this matter and its continued courtesies.

Respectfully submitted,

s/ Brock Fredin

Brock Fredin

cc: K. Jon Breyer (by ECF)  
Adam C. Ballinger (by ECF)